

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA, ) **INDICTMENT** CR 11-11 DSD/JJG  
)  
Plaintiff, ) (18 U.S.C. § 2251(a))  
) (18 U.S.C. § 2251(e))  
v. ) (18 U.S.C. § 2252(a)(4)(B))  
) (18 U.S.C. § 2252(b)(2))  
JOSE ANTONIO SOTO, ) (18 U.S.C. § 2253)  
) (18 U.S.C. § 2253(a))  
Defendant. )  
)

THE UNITED STATES GRAND JURY CHARGES THAT:

**COUNT 1**

(Production of Child Pornography)

Beginning on a date unknown to the Grand Jury, but between March, 2004, and February, 2007, in the State and District of Minnesota, the defendant,

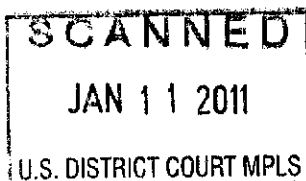
**JOSE ANTONIO SOTO,**

knowingly employed, used, persuaded, induced, or coerced a minor, Jane Doe #1 (VHS tape #1, video clip #1) to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, said visual depiction having been produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

**COUNT 2**

(Production of Child Pornography)

Beginning on a date unknown to the Grand Jury, but between March, 2004 and February, 2007, in the State and District of



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RICHARD D. ALLEN  
JUDICIAL CLERK  
DEPT. OF CORRECTIONS

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Minnesota, the defendant,

**JOSE ANTONIO SOTO,**

knowingly employed, used, persuaded, induced, or coerced a minor, Jane Doe #1 (VHS tape #1, video clip #2) to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, said visual depiction having been produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

**COUNT 3**

(Production of Child Pornography)

Beginning on a date unknown to the Grand Jury, but between March, 2004 and February, 2007, in the State and District of Minnesota, the defendant,

**JOSE ANTONIO SOTO,**

knowingly employed, used, persuaded, induced, or coerced a minor, Jane Doe #2 (VHS tape #1, video clip #3) to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, said visual depiction having been produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

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**COUNT 4**

(Production of Child Pornography)

Beginning on a date unknown to the Grand Jury, but between March, 2004 and February, 2007, in the State and District of Minnesota, the defendant,

**JOSE ANTONIO SOTO,**

knowingly employed, used, persuaded, induced, or coerced a minor, Jane Doe #2 (VHS tape #1, video clip #4) to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, said visual depiction having been produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

**COUNT 5**

(Production of Child Pornography)

Beginning on a date unknown to the Grand Jury, but between March, 2004 and February, 2007, in the State and District of Minnesota, the defendant,

**JOSE ANTONIO SOTO,**

knowingly employed, used, persuaded, induced, or coerced a minor, Jane Doe #3 (VHS tape #2, video clip #1) to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, said visual depiction having been produced using

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materials that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

**COUNT 6**

(Production of Child Pornography)

Beginning on a date unknown to the Grand Jury, but between March, 2004 and February, 2007, in the State and District of Minnesota, the defendant,

**JOSE ANTONIO SOTO,**

knowingly employed, used, persuaded, induced, or coerced a minor, Jane Doe #3 (VHS tape #2, video clip #2) to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, said visual depiction having been produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

**COUNT 7**

(Production of Child Pornography)

Beginning on a date unknown to the Grand Jury, but between March, 2004 and February, 2007, in the State and District of Minnesota, the defendant,

**JOSE ANTONIO SOTO,**

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knowingly employed, used, persuaded, induced, or coerced a minor, Jane Doe #3 (VHS tape #2, video clip #3) to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, said visual depiction having been produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

**COUNT 8**

(Production of Child Pornography)

Beginning on a date unknown to the Grand Jury, but between March, 2004 and February, 2007, in the State and District of Minnesota, the defendant,

**JOSE ANTONIO SOTO,**

knowingly employed, used, persuaded, induced, or coerced a minor, Jane Doe #1 (VHS tape #3, video clip #1) to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, said visual depiction having been produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

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**COUNT 9**

(Production of Child Pornography)

Beginning on a date unknown to the Grand Jury, but between March, 2004 and February, 2007, in the State and District of Minnesota, the defendant,

**JOSE ANTONIO SOTO,**

knowingly employed, used, persuaded, induced, or coerced a minor, Jane Doe #1 (VHS tape #3, video clip #2) to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, said visual depiction having been produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

**COUNT 10**

(Production of Child Pornography)

Beginning on a date unknown to the Grand Jury, but between March, 2004 and February, 2007, in the State and District of Minnesota, the defendant,

**JOSE ANTONIO SOTO,**

knowingly employed, used, persuaded, induced, or coerced a minor, Jane Doe #2 (VHS tape #3, video clip #3) to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, said visual depiction having been produced using

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materials that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

**COUNT 11**

(Production of Child Pornography)

Beginning on a date unknown to the Grand Jury, but between March, 2004 and February, 2007, in the State and District of Minnesota, the defendant,

**JOSE ANTONIO SOTO,**

knowingly employed, used, persuaded, induced, or coerced a minor, Jane Doe #2 (VHS tape #3, video clip #4) to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, said visual depiction having been produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

**COUNT 12**

(Production of Child Pornography)

Beginning on a date unknown to the Grand Jury, but between March, 2004 and February, 2007, in the State and District of Minnesota, the defendant,

**JOSE ANTONIO SOTO,**

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knowingly employed, used, persuaded, induced, or coerced a minor, Jane Doe #3 and Jane Doe #4 (VHS tape #4, video clip #1) to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, said visual depiction having been produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

**COUNT 13**

(Production of Child Pornography)

Beginning on a date unknown to the Grand Jury, but between March, 2004 and February, 2007, in the State and District of Minnesota, the defendant,

**JOSE ANTONIO SOTO,**

knowingly employed, used, persuaded, induced, or coerced a minor, Jane Doe #3 (VHS tape #4 video, clip #2) to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, said visual depiction having been produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).



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**COUNT 14**

(Production of Child Pornography)

Beginning on a date unknown to the Grand Jury, but between March, 2004 and February, 2007, in the State and District of Minnesota, the defendant,

**JOSE ANTONIO SOTO,**

knowingly employed, used, persuaded, induced, or coerced a minor, Jane Doe #2 (VHS tape #9, video clip #2) to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, said visual depiction having been produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

**COUNT 15**

(Production of Child Pornography)

Beginning on a date unknown to the Grand Jury, but between March, 2004 and February, 2007, in the State and District of Minnesota, the defendant,

**JOSE ANTONIO SOTO,**

knowingly employed, used, persuaded, induced, or coerced a minor, Jane Doe #3 (VHS tape #9, video clip #4) to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, said visual depiction having been produced using

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materials that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

**COUNT 16**

(Production of Child Pornography)

Beginning on a date unknown to the Grand Jury, but between March, 2004 and February, 2007, in the State and District of Minnesota, the defendant,

**JOSE ANTONIO SOTO,**

knowingly employed, used, persuaded, induced, or coerced a minor, Jane Doe #2 (VHS tape #20, video clip #1) to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, said visual depiction having been produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

**COUNT 17**

(Production of Child Pornography)

Beginning on a date unknown to the Grand Jury, but between March, 2004 and February, 2007, in the State and District of Minnesota, the defendant,

**JOSE ANTONIO SOTO,**

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knowingly employed, used, persuaded, induced, or coerced a minor, Jane Doe #3 (VHS tape #20, video clip #2) to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, said visual depiction having been produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

**Forfeiture Allegations**

Counts 1-17 of this Indictment are hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2253(a).

As a result of the foregoing offenses, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253(a):

(1) any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of this chapter, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of this chapter;

(2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and

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(3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property, including but not limited to the following: Twenty (20) VHS video tapes that contain video clips of child pornography.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b).

All in violation of Title 18, United States Code, Sections 2252(a)(4)(B), 2252(b)(2) and 2253(a).

A TRUE BILL

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UNITED STATES ATTORNEY

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FOREPERSON